

## Local Plan evidence base – Question 113 – 144

### Summary of Regulation 18 consultation responses (March 2026)

#### Question 113 – Do you have any comments on supporting Local Plan documents or the evidence base?

Total Number of responses received: 129		
Yes	No	Not stated
95	2	32

#### Question 114 – Comments received

A total of 126 comments were made by respondents to this question. Some responses included feedback on more than one supporting document or evidence base. The feedback reflected a range of views from residents, community groups, statutory bodies and developers.

##### Summary of issues raised

Responses received were predominantly from professional stakeholders including developers and planning agents. A small number of responses related to other sections of the Local Plan, including technical data queries in relation to borough population figures in Chapter 3, objection to the length and structure of the document and volume of supporting evidence, concerns about site-specific allocations, as well as the Proposals Map, concerns about compliance with the NPPF reforms and objections to the approach to accelerated housing development and the impact on the environment.

The following responses specifically relate to the supporting documents and evidence base.

##### Supporting documents

- Interim Sustainability Appraisal – Four responses were received, principally objecting to site-specific assessments against the SA objectives. Developers questioned why their site-specific technical studies, and potential mitigation measures, had not been considered in the SA assessments.
- Interim Viability Assessment – A single developer response received expressed concern regarding the viability of some site allocations, that will have to provide 50% affordable housing ‘NPPF golden rules’ in addition to other expected s106 costs. All potential costs should be considered in the viability assessment.

##### Local Plan evidence

- Draft Active Travel Strategy – A single response received expressed concern regarding the detail of the Kings Hill route audits undertaken to inform the Strategy, and the adequacy of existing cycle route provision within Kings Hill.
- Economy Study Update – Three responses received, one expressing support for the conclusions and recommended employment floor space requirements, the other two expressing conflicting concerns with one stating that the employment floorspace is overstated, and the other seeking provision for the higher Scenario 3 (Labour Supply) option.
- Green and Blue Infrastructure Strategy – A single response was received clarifying that a promoted site is not identified as part of the green infrastructure network.
- Green Belt Methodology and/or Assessments – Forty-three responses were received on this evidence, the majority from developers/site promoters. The comments broadly support the need for a robust Green Belt Assessment but some highlight concerns with the methodology, consistency, settlement classification, application of heritage constraints, and interpretation of national policy. Most developers and site promoters who responded, state that their sites qualify as Grey Belt and should be allocated in the Local Plan. However, other respondents argue the Assessment underplays impacts (especially heritage or landscape) and wrongly classifies some sites as Grey Belt.
- Green Gap Study – Four responses received. The majority were from developers and site promoters who do raised concerns about the justification of such an approach, the proposed boundary and whether such an approach was compliant with national policy. The remaining response was from a community group, and they expressed support for the Green Gap but sought amendments to the boundary.
- Heritage Impact Risk Assessment – Two responses were received from a single respondent and raised site-specific concerns regarding the assessment and conclusions in relation to site E8.
- Heritage Strategy – A single response was received expressing support for the preparation of the Heritage Strategy, including support for the recognition of non-designated heritage assets and the creation of a local list.
- Housing Market Delivery Study – Two responses were received from a single site promoter expressing support for the conclusions in the study, but also raising concerns about the assumptions applied to site BG1.
- Interim Land Availability Assessment – Thirty-five responses were received, the majority from developers and site promoters. Many respondents disagreed with the Interim LAA conclusions and some raised concerns that the Interim LAA contains errors in the methodology, factual inaccuracies, and inconsistent application of assessment criteria across sites. Numerous sites considered

“unsuitable” or “undeliverable” are suggested by site promoters to be suitable, sustainable, and capable of mitigation, and which should be allocated in the Regulation 19 Local Plan.

- Landscape and Visual Appraisal – Two responses were received, both from developers and site promoters who identify that the LVA overstate landscape and visual harm because they do not factor in detailed site layouts and assume no mitigation, and that the LVA uses overly broad or theoretical methods that do not reflect site specific constraints or design opportunities.
- Landscape Character and/or Sensitivity Assessment – Four responses received, all from site promoters. These broadly disagree with the site-specific conclusions, and express concerns that the Landscape Sensitivity Assessment’s broad parcels overstate sensitivity. The Landscape & Visual Appraisal is criticised as precautionary because it assumes no mitigation, uses development typologies, and assesses a ‘Year 1’ scenario before planting establishes. Therefore, respondents are concerned that visual and landscape harm is said to be exaggerated, and not a reliable basis for ruling out their sites.
- Playing Pitch and Outdoor Sports Facilities Strategy – Two responses were received expressing both support for the findings of this evidence in relation to the provision of future football facilities, as well as concern regarding the identified gap in hockey facilities.
- Strategic Flood Risk Assessment – A single response was received expressing concern that the SFRA is not yet complete, and related surface water implications for Tonbridge arising from proposed growth.
- Strategic Housing Market Assessment – Two responses were received. One respondent suggested that the Draft Local Plan relies too heavily on large strategic sites to meet identified needs for affordable housing, specialist and older persons accommodation. The other promotes a site.
- Sustainable Settlement Study – A single response received which expresses support for the approach taken, and the identification of Kings Hill as a service centre.
- Transport and/or Junction Modelling Reports – Three responses were received which raise the following concerns.
  - Insufficient reporting: Key technical appendices (e.g. Appendix B) are missing, making it hard for non-technical readers to interpret the modelling. Conclusions lack clear justification due to limited explanation.
  - Inconsistency in junction modelling: Some less critical junctions were modelled while severely congested ones were not e.g. A227 Shipbourne Rd / B245 London Rd; A26 Hadlow Rd / The Ridgeway. This raises concerns about the consistency of the evidence and related justification for development allocations at Tonbridge and elsewhere.

- Concerns over modelling methodology: Use of simplified arm-based assessments rather than whole junction model is considered inadequate, especially where flows are above 80% capacity. Lack of queue length validation data undermines reliability.
- Contradictory conclusions: Some junctions identified in earlier modelling as needing mitigation are now shown as not requiring it e.g. Mills Road / Hall Road, despite significantly higher planned growth, raising doubts about modelling accuracy.
- Detailed impacts not fully assessed: Tonbridge's constrained 'hourglass' road network means increased development, especially in the north, will worsen pressure on the two Medway River crossings. Further detailed modelling is required.
- Testing of mitigations: Concern that this has not yet been progressed, with specific concerns raised regarding potential options in some locations, e.g. introduction of signals at Rochester Rd / Forstal Rd / High Street could worsen congestion.

#### Background papers

- Interim Infrastructure Delivery Plan – Ten responses were received; these cover a range of issues including:
  - Utilities (see Summary of feedback from Statutory Consultees below)
    - Sport, recreation and community facilities – respondents noted a mismatch between the Playing Pitch Strategy and IDP regarding the loss of the Cobdown hockey pitch. There was support for the IDP's recognition of sport as essential infrastructure and seeks prioritisation for Section 106/CIL funding toward stadium improvements and wider community sports provision, and highlighting a lack of Scouting facilities and asks that new community infrastructure be secured to serve increased youth demand from new housing.
  - Healthcare – Responses emphasise that the IDP must clearly identify required healthcare infrastructure, with costs defined and reflected in viability evidence. Respondents sought ongoing engagement with the NHS/ICB to ensure developments contribute appropriately.
  - Transport - Concern was expressed that South Tonbridge cannot absorb further development without major investment in road and transport infrastructure. The A26 Hadlow Road is also identified as overstretched.
  - Infrastructure deficits - Some respondents raised concerns that services in areas such as Hildenborough cannot support proposed growth due to, water shortages (ongoing hosepipe bans), poor road conditions, limited GP capacity and inadequate school capacity.

- Local Green Space Topic Paper – A single response was received from a site promoter objecting to the inclusion of Land at Corner of Lavenders Road and Swan Street, West Malling.
- Spatial Strategy Topic Paper – A single response was received relating to Tonbridge and specifically Higham, with questions raised regarding related assessment.
- Windfall Allowance Topic Paper – Two responses were received from site promoters, both raising concern regarding the justification of a large site windfall allowance and suggesting that more sites should be allocated in the plan to provide flexibility in delivery.

#### Summary of feedback from Statutory Consultees

- **Historic England** – Commented that Local Plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (NPPF Paragraph 32), which would include the historic environment. This up-to-date evidence should be used to assess the significance of heritage assets and the contribution they make to the environment. Evidence on which policies for the historic environment are prepared should be published, as required by paragraph 206 of NPPF. The Heritage Strategy and Heritage Impact Risk Assessment, inter alia, will amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.
- **National Highways** - finds that overall, the modelling approach and methodologies used are considered acceptable. However, further work is required ahead of the Regulation 19 stage and subsequent submission and examination of the Plan in order to demonstrate compliance with national policy, including detailed junction modelling.
- **Natural England** – Submitted several evidence base comments as follows.
  - Site Selection Topic Paper – Natural England note that the Plan includes allocations that fall within or within the settings of the Kent Downs and High Weald National Landscapes and, as such, the plan is supported by landscape evidence, including a Landscape and Visual Appraisal. Natural England welcome this evidence but conclude that it is not clear how it has informed the site selection process or the testing of reasonable alternatives within the Sustainability Appraisal. As such, there remain discrepancies between the conclusions of the LVA and the overall selection of sites. Together with the findings of the Habitats Regulations Assessment and SA, the LVA evidence should be used to guide the Local Plan towards allocating sites of least environmental value in line with NPPF paragraph 188, such as those that avoid or fully mitigate their landscape impacts.

Natural England note that TMBC has not adopted a definition of ‘major development’ with respect to development in the National Landscape. Taking account of NPPF footnote 67, they strongly advise that TMBC adopts a definition of major development in the next iteration of the Plan.

- Interim Sustainability Appraisal – Natural England note that the landscape and townscape site assessment criteria have been amended so that sites within 1km of a National Landscape are now identified as having a significant negative effect with uncertainty. They advise that using a 1km buffer as the sole criterion for assessing impacts on National Landscapes is not appropriate.

They note that the Land Availability Assessment sets out the reasons for selecting sites and that alternative residential site options are tested in Table 5.1 of the SA. However, neither the SA nor the LAA currently reflect the evidence and conclusions of the LVA. They note that TMBC intends to incorporate the LVA evidence in the next iteration of the SA, and they advise that the testing of site options is rerun to take account of the LVA evidence and conclusions, including potential unmitigable effects on the National Landscapes and their settings.

Natural England concur with the general approach of the SA, they advise that without the integration of site-specific LVA evidence, the appraisal cannot adequately assess the likely significant effects of allocations on nationally designated landscapes. Incorporating this evidence will help ensure that the Local Plan is robust and that allocations are selected in a way that balances housing needs with the protection and enhancement of the National Landscapes’ special qualities.

- Habitats Regulations Assessment – Natural England advise that the list of conservation objectives for Peters Pit Special Area of Conservation is incomplete. Further to this, they advise that the list of qualifying features is incomplete for the Medway Estuary and Marshes Special Protection Area, the Medway Estuary and Marshes Ramsar site and the Thames Estuary & Marshes Ramsar site. They concur with the scoping in of habitats sites in this section. Further to this, they also concur with the conclusions of the test of likely significant effects.

Natural England note that the HRA identifies that impacts from recreational pressure to North Downs Woodlands SAC are most likely from allocations that fall within 2km of the SAC. The HRA identifies four residential allocations within this zone but highlights that recreational pressure concerns are associated with the Wouldham to Detling Escarpment SSSI component of the SAC. However, section 5.8 concludes that only the Land north of Holborough Lakes, Snodland (SN1) allocation is likely to adversely affect the SAC without mitigation.

Natural England advise that further justification is required to support the conclusion that the remaining three allocations will not adversely affect the SAC, all of which are closer to the Wouldham to Detling Escarpment Site of Special Scientific Interest (SSSI). Otherwise, the HRA appears to indicate that the remaining allocations require semi-natural publicly accessible open space as part of its development to conclude there will be no adverse effect on the integrity of the SAC. Natural England concur with the remaining conclusions of the appropriate assessment with respect to other impact pathways.

- **Network Rail** – Submitted comments in the Interim Infrastructure Delivery Plan, they consider that the content for rail is relevant and up to date at the time of publication. They request that the Tonbridge Strategic Station Plan (2025) is referred to as this is the up-to-date evidence base, that supports identified improvements at the station.
- **National Grid Electricity Transmission (NGET)** - ask that Local Plan policies explicitly recognise transmission infrastructure within development sites and require masterplans to respond to overhead line constraints. They request ongoing consultation and note major forthcoming grid upgrades.
- **South East Water** - raised concerns that the proposed housing growth exceeds the capacity assumed in its Water Resources Management Plan (WRMP24). Additional growth cannot be supported without new water supply interventions (not planned until WRMP29, 2027–2028). They call for stricter water efficiency standards, incorporation of groundwater Source Protection Zones, and early engagement on reinforcement requirements.
- **Kent County Council** –submitted the following comments in relation to the Interim Infrastructure Delivery Plan.
  - Waste – KCC outline that in addition to the Allington Household Waste and Recycling Centre, residents in the northern half of the borough use Tovil HWRC, Maidstone. Tovil HWRC experiences seasonal variation in capacity (60% capacity in winter, 80% capacity in summer) but is typically at 100% capacity at weekends. Residents in the southern half of TMBC typically choose to travel to the nearest site at North Farm, Tunbridge Wells. Like the Tovil HWRC, this site is at/near capacity. Additional housing growth in both Tunbridge Wells and Tonbridge and Malling will add further pressure. Kerbside collected waste from the southern half of Tonbridge and Malling is taken to the KCC Waste Transfer Station at North Farm, Tunbridge Wells. This facility is predicted to be at capacity within the next five years.
  - Education – KCC has also assessed the impact of proposed Local Plan developments through its framework of existing planning groups (clusters of schools) in the borough, to forecast demand and manage school place

provision. The assessment has been conducted based on a 'maximum pupil yield approach'; this means that the county council has assessed the developments as if all units will be houses; any proposed development that contains significant proportions of flats would likely yield fewer pupils. KCC have proposed both primary and secondary mitigation, which has been incorporated into the Interim Infrastructure Delivery Plan, including school expansions and new schools. Further work is required to confirm these requirements including the preparation of feasibility studies.

- Highways and transportation - Section 9 of the Infrastructure Delivery Schedules mentions KCC funding in areas where it has responsibility (e.g. highways). KCC request that it is not identified as a potential funder unless funding is secured through government funding bids that are specifically allocated to a scheme. KCC will only support developer funded mitigations through the Local Plan process, and as such requests that all highway-related schemes use S278 with a developer or consortium of developers responsible for the scheme delivery (as agreed). KCC will not accept S106 contributions for highways schemes unless this has been explicitly agreed.

KCC request that TMBC review the provision of overnight lorry parking in its Local Plan. There is an evidenced 'local shortage/need' for lorry parking spaces, as referenced in the NPPF and the Department for Transport's Circular 01/2022. KCC is willing to share related data on this with TMBC.

#### Summary of feedback from District / Boroughs

- **Tunbridge Wells Borough Council** - TWBC notes that the Green Belt Assessment Methodology was subject to early-stage consultation with neighbouring authorities. TWBC is satisfied that the comments submitted during this consultation have been adequately in the updated methodology.
- **Medway Council** – Note that the Tonbridge and Malling Habitats Regulations Assessment indicates impacts arising from the Maidstone and Medway Local Plans, on the North Downs Woodland SAC at the EO5a transect off the A249 north of Maidstone. They advise that TMBC may find it helpful to review the updated Medway HRA in reviewing this reference for the submission draft of the Council's HRA.

#### Summary of feedback from Parish Councils

- **Borough Green Parish Council** – The parish council have serious concerns about potential bias in the Green Belt Assessment, due to it being prepared by consultants Arup, who are a developer. They consider it inconceivable that of the

136 sites selected for grey belt appraisal, only two in West Malling are deemed retainable as Green Belt. They also have concerns about the selection of sites for assessment referencing parcels that are within the Green Belt, National Landscape and which are also safeguarded or worked for minerals.

- **East Malling and Larkfield Parish Council** – The Parish Council submitted comments regarding sites that are assessed in the Interim Land Availability Assessment. Referencing appendix 3, they expressed support for the exclusion of the following sites, providing related comments – 59936, 59726, 59630, 68362, 58539, 59631, 59636, 68363, 59824, 59715. They have asked the Council to consider again the potential suitability of site 58541 Lavender Road/Catlyn Close - Garages, East Malling. The parish support the potential redevelopment of this site.
- **Ryarsh Parish Council** – Submitted comments on the Interim Land Availability Assessment, expressing concerns regarding the suitability of sites 58665 - Existing Premises at Holmes Paddock off (west of) The Street, and Site 59744 – Chapel Street, for development.

#### Officer response to the consultation feedback

Officers acknowledge the number and breadth of responses received on the Local Plan supporting and evidence base documents. The comments provided will be considered carefully by officers and appointed consultants, in updating and progressing all aspects of this work in preparation for Regulation 19.